

GIULIANO LAW, PC
Attorneys for Movant
445 Broadhollow Rd., Ste. 25
Melville, NY 11747
(516) 792-9800
afg@glpcny.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

CK ONLINE, LLC

Chapter 7

Case No.: 24-22589

Debtor.
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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the motion dated August 19, 2024, of Viahart, LLC (the “Movant”), a creditor and party in interest in the bankruptcy of CK Online, LLC (the “Debtor”), by its attorneys, Giuliano Law, PC, seeking the entry of an order pursuant to 11 U.S.C. § 362(d), and Rules 4001, 9013, and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”): (i) granting relief from the automatic stay to permit Movant to take all actions necessary to continue, adjudicate, and complete the action filed in the Southern District of New York captioned *Viahart, LLC v. Creative Kids Online, LLC et al.* 1:20-cv-9943 (the “District Court Action”) so as to liquidate the damages owed to Movant by the Debtor and the other parties to the action, Creative Kids Online LLC, Creative Kids Far East Inc., and Creative Kids Enterprises LLC (collectively, the “Co-Defendants”); (ii) waiving the 14 day stay pursuant to FRBP 4001(a)(3); (iii) sanctioning Debtor, the Co-Defendants, and Samuel Lapa for filing this meritless bankruptcy petition, thereby abusing judicial process under Section 105 of the Bankruptcy Code (11 U.S.C. § 105) and pursuant to the Court’s inherent authority; and (iv) granting such other and further relief as this Court deems just and proper. there will be a hearing conducted by videoconference via Zoom before the

Honorable Sean H. Lane, United States Bankruptcy Judge, at the United States Bankruptcy Court, Southern District of New York on the **5th day of September, 2024** at 10:00 am (the “Hearing”).

PLEASE TAKE FURTHER NOTICE, that the Hearing shall not be held in person but shall be held conducted via Zoom. Those intending to appear at the Hearing must register with eCourt Appearances no less than twenty-four (24) hours prior to the Hearing with eCourt Appearances: <https://ecf.nyeb.uscourts.gov/cgi-bin/eCourtAppearances.pl> The video link for the Hearing will be emailed only to those that register with eCourt Appearances in advance of the Hearing. Instructions for registering with eCourt Appearances can be found at <https://www.nyeb.uscourts.gov/registering-remote-hearing-appearance-using-ecourt-appearances>.

PLEASE TAKE FURTHER NOTICE, that objections to the relief requested in the Motion must be in writing, stating with specificity the basis or bases on which such party in interest objects to the within Motion, filed with the Bankruptcy Court at the Court’s website www.nyeb.uscourts.gov (Password and Login Required) (with a copy delivered directly to Chambers) and served upon Giuliano Law, PC, Suite 25, Melville, NY, 11747, Attn: Anthony F. Giuliano, Esq., so as to be received no later than seven (7) days prior to the hearing date.

Dated: Melville, New York
August 19, 2024

GIULIANO LAW, PC
Attorney for Movants
445 Broadhollow Rd. Ste. 25
Melville, New York, 11747
Tel: (516) 792-9800
Anthony F. Giuliano, Esq.
afg@glpcny.com

By: /s/ Anthony F. Giuliano
Anthony F. Giuliano, Esq.